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Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00014-DJC
)	
Plaintiff,)	STIPULATION FOR TEMPORARY
)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.)	RELEASE; ORDER
)	
BRYAN PAUL TAMBLYN,)	Hon. Carolyn K. Delaney
)	
Defendant.)	
)	

The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to attend a family gathering at his mother's home in Sacramento, CA, in celebration of Independence Day. The parties have conferred with Mr. Tamblyn's assigned pretrial services officer, who approves of this stipulated modification.

Mr. Tamblyn has been on pretrial release in this district since February 2020, on a \$50,000 unsecured appearance bond as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. *See* Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust). Additionally, Mr. Tamblyn has three (3) appointed third party custodians: Richard Espinosa, Sr., Jerome Espinosa, and Sheri Placencia.

1 Mr. Tamblyn is in compliance with all of his conditions of release. One of those
2 conditions of release is location monitoring. Mr. Tamblyn is subject to curfew, and therefore
3 must remain inside his residence between the hours of 8:00 p.m. and 8:00 a.m. except for pre-
4 approved employment; education; religious services; medical, substance abuse, or mental health
5 treatment; attorney visits; court appearances; court ordered obligations; or other activities
6 authorized by the pretrial services officer¹.

7 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of
8 Release be temporarily amended to specifically permit him to attend a family gathering at his
9 mother's home in Sacramento, CA. Mr. Tamblyn's mother is hosting a gathering of family
10 members to celebrate Independence Day that is expected to conclude at 11:00 p.m. on Tuesday,
11 July 4, 2023. The guests will include Mr. Tamblyn's parents, siblings, and uncles, all of whom
12 are adults.

13 Mr. Tamblyn's mother's home is (approximately) a 35-minute drive from Mr. Tamblyn's
14 residence in Elk Grove, CA. Allowing some additional time for traffic and some time set aside
15 to help with clean-up, the parties request a temporary modification of pretrial conditions to
16 permit Mr. Tamblyn to return home by midnight (11:59 p.m.) on Tuesday, July 4, 2023. Mr.
17 Tamblyn will be in the company of at least one third party custodian and multiple sureties at his
18 mother's home. Mr. Tamblyn will return directly to his residence at the conclusion of the
19 gathering.

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26 _____
27 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
28 essential, with all other activities requiring the approval of the Court. The pretrial services officer who supervises
Mr. Tamblyn advised defense counsel that this specific request should be submitted to the Court for approval, in the
form of a stipulation by the parties.

1 The proposed temporarily amended condition is attached to this request. The parties do not
2 request a hearing in this matter in light of this stipulation.

3
4 Respectfully submitted,

5 DATED: June 28, 2023

HEATHER E. WILLIAMS

6 Federal Defender

7 /s/ Megan T. Hopkins

8 MEGAN T. HOPKINS

Assistant Federal Defender

9 Attorney for BRYAN PAUL TAMBLYN

10
11 DATED: June 28, 2023

PHILLIP A. TALBERT

12 United States Attorney

13 /s/ Christina McCall

14 CHRISTINA MCCALL

Assistant United States Attorney

15 Attorney for the United States

ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to attend a family gathering in celebration of Independence Day at his mother's home in Sacramento, CA and return to his residence no later than 11:59 p.m. on Tuesday, July 4, 2023. Mr. Tamblyn shall not be in the presence of any juveniles or minors unless that juvenile or minor's parent or guardian is also present and the pretrial services officer has had an opportunity to speak with the parent or guardian in advance and has confirmed pretrial's approval. All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

Dated: June 29, 2023


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE